



GIANT FOOD LLC.

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February 2, 2005

The Honorable William T. Hawks
Under Secretary for Marketing and Regulatory Programs
U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Dear Secretary Hawks:

Giant Food LLC is pleased to respond to the Department of Agriculture's request for comments on interim final regulations for Country of Origin Labeling for fish and seafood. Giant operates 205 stores throughout Virginia, Maryland, the District of Columbia, Delaware, and the southern New Jersey region. We respectfully request that you address two major issues in the final rule. We also would like you to know that we have worked very hard for the past few years on the Country of Origin Labeling issues as they impact our retail business and we will do all we can to fully comply with the Country of Origin Labeling Act to the fullest extent of the law.

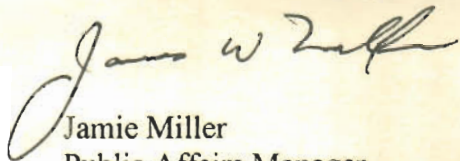
The primary issue to us at this time is one to simplify the record-keeping provisions in the final regulations. **We feel strongly** that the corporate record-keeping requirement needs to be changed and believe that the label on the shipping container should stand as the official record with the Julian date to stand in place of the lot number. The label on the case is the best way operational-wise to handle the information necessary to comply with the Act. The information contained on the label is supplied directly by each of our suppliers with the product and held at store level until the product is sold. We believe that this should serve as the only official record necessary to be maintained by retail stores. This will eliminate errors at the store level and at the same time, provide a complete supplier record. Removing the requirement for corporate intermediary record-keeping should then occur.

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Finally, we would like to ask for additional time despite the fact that we know that enforcement will not begin until the fall. The interim final rule is effective the first of April and we would like to have a new effective date with the final rule so that we can implement Seafood Country of Origin Labeling to the best of our ability.

We appreciate your attention to our comments.

Sincerely,



Jamie Miller
Public Affairs Manager